

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Daniel Antonio Baez Arciniega, *on behalf of
himself and others similarly situated in the
proposed FLSA Collective Action,*

Case No.: 23-cv-05532

Plaintiff,

STIPULATION

- against -

Zalmen Management LLC, Zalmen Management
Co. Inc., and Shnayer Klein,

Defendants.

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Defendants Zalmen Management LLC, Zalmen Management Co. Inc., and Shnayer Klein
(collectively, the “Defendants”) by their undersigned counsel, agree and stipulate with Plaintiff
Daniel Antonio Baez Arciniega (the “Plaintiff”), by his undersigned counsel, as follows:

IT IS HEREBY STIPULATED AND AGREED by and between the parties that pursuant
to Federal Rule of Civil Procedure (“Fed.R.Civ.P.”) 15(a)(2), Plaintiff shall be granted leave to
file the proposed Amended Complaint annexed hereto as Exhibit “A”,

IT IS FURTHER STIPULATED AND AGREED that Defendant’s counsel accepts service
of process of proposed Amended Complaint on behalf of the Defendants, and

IT IS FURTHER STIPULATED AND AGREED that Defendants waive any defense to
personal jurisdiction due to improper service of process of the proposed Amended Complaint; and

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be signed in
counterparts and that a facsimile copy or other electronic copies shall be deemed originals.

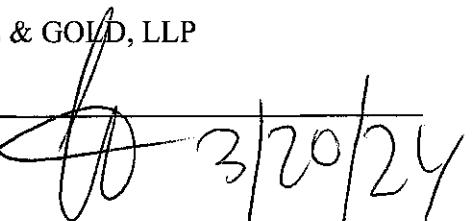
Dated: New York, New York
March 20, 2024

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: 

MINTZ & GOLD, LLP

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By: 

3/20/24